

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE FOR THE DISTRICT OF DELAWARE

FIRST QUALITY TISSUE, LLC,

Plaintiff,

v.

IRVING CONSUMER PRODUCTS LIMITED
and IRVING CONSUMER PRODUCTS, INC.

Defendants.

C.A. No. 19-428-RGA

DECLARATION OF MATTHIEU HAUSIG

I, Matthieu Hausig, declare and state as follows under penalty of perjury:

1. My name is Matthieu Hausig. I make this declaration based on my personal knowledge of the facts contained herein. The facts recited in this declaration are true and accurate to the best of my knowledge and belief.

2. I am an attorney at the law firm of Amster Rothstein & Ebenstein LLP (“Amster”). I was admitted to the New York State bar in 2002.

3. In 2012-2013, as well as other periods, Amster worked with First Quality Tissue, LLC (“First Quality”) on patent prosecution and freedom to operate legal work relating to bath tissue. In relation to that work, in February 2012, Amster retained Dr. Mark Malburg to act as a technical expert and consultant for First Quality.

4. I have reviewed the September 11, 2020 Declaration of James E. Sealey. I agree with Dr. Sealey's statement that "First Quality also worked with its attorneys at Amster, including around January 15-17, 2013, for legal advice and analysis relating to obtaining patent protection on soft bath tissues. At the direction of Amster, First Quality contacted Dr. Malburg regarding consulting work to provide analysis and interpretation of data necessary for Amster to advise on prosecution of First Quality's patent applications on soft bath tissue. In connection with this work, around February and March 2013, Dr. Malburg worked with First Quality to perform analysis and interpretation of various data, and this analysis and interpretation was sent to and used by Amster for purposes of provided legal advice with respect to patent prosecution." September 11, 2020 Sealey Decl. at ¶ 9. (citations omitted).

5. I have also reviewed the October 12, 2020 Declaration of James E. Sealey. I agree with Dr. Sealey's statement that "Also around January 2013, First Quality communicated with Dr. Malburg for clarifications on the earlier freedom to operate work, and also, at the direction of Amster, to consult on analysis and interpretation for Amster to advise on prosecution of First Quality's patent applications on soft bath tissue." October 12, 2020 Sealey Decl. at ¶ 5.

6. I visited First Quality from around January 15-16, 2013 and had meetings with First Quality employees about preparation of patents relating to soft bath tissues. FIR_QUA_ECA0001907191; FIR_QUA_ECA0001907222. During these meetings we discussed having First Quality consult with Dr. Malburg on performing additional analysis and interpretation of tissue data for Amster to use in advising First Quality on the preparation of these patents, continuing our previous and ongoing discussions regarding the same since around February 2012 when Dr. Malburg was first engaged (including discussions with First Quality in-house attorney Mr. Moshe Oppenheim). FIR_QUA_ECA0001970201; FIR_QUA_ECA0001970036;

FIR_QUA_ECA0001969175. Amster, First Quality, and Dr. Malburg had collected and analyzed this data together in 2012, and this additional analysis that Amster directed was a re-analysis of the data to address certain patent preparation related issues.

7. I understand that Dr. Malburg worked with First Quality on this patent related analysis around February 5, 2013.

8. Three days later, on February 8, 2013, First Quality emailed me results from this re-analysis, per our discussion from the prior month. FIR_QUA_ECA0001907191.

9. At least one patent application was subsequently filed. For example, on March 15, 2013, Amster and First Quality communicated about the patent application and referenced Dr. Malburg in the communication. FIR_QUA_ECA0001907175.

Dated: January 29, 2021

A handwritten signature in black ink, appearing to read 'MH', is written over a light green rectangular background.

Matthieu Hausig